



# PUBLIC NOTICE

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**DA 02-599**

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## WIRELESS TELECOMMUNICATIONS BUREAU SEEKS COMMENT ON REQUEST FOR WAIVER OF AIRCRAFT STATION IDENTIFICATION REQUIREMENT

**Comment Date: March 27, 2002**

**Reply Date: April 3, 2002**

On February 26, 2002, the Great Lakes Region of the Federal Aviation Administration (FAA) requested an exemption from the Commission's Part 87 Rules to specify a standard form of station identification for aircraft being operated by maintenance personnel as these personnel move the aircraft from one location to another location at the airport.<sup>1</sup> Section 87.107(a) of the Commission's Rules specifies the permissible means by which aircraft stations may identify themselves.<sup>2</sup> Section 87.107(a)(3) provides that station identification may consist of the type of aircraft followed by the characters of the registration marking ("N" number) of the aircraft, omitting the prefix letter "N."<sup>3</sup> Additionally, when a ground station initiates communication, an aircraft station may use as its station identification the type of aircraft followed by the last three letters of the registration marking.<sup>4</sup>

The FAA states that problems have arisen recently with respect to communications between air traffic ground controllers and aircraft maintenance personnel as the personnel move aircraft within an airport.<sup>5</sup> According to the FAA, these problems stem from the absence of a standard form of station identification for aircraft operated by maintenance personnel, and have resulted in "runway incursions."<sup>6</sup> The FAA, therefore, requests to use a station identification consisting of the company name, the word "maintenance" and the last three letters of the "N" number of the aircraft to identify aircraft that maintenance personnel are moving from one location to another location in the airport. For example, an appropriate station identification for an aircraft operated by maintenance personnel would be "United Maintenance 123 Uniform Alpha" in lieu of "Boeing November 123 Uniform Alpha."<sup>7</sup> The FAA states

<sup>1</sup> Letter to Ms. Kim Kleppinger, Public Safety and Private Wireless Division, Wireless Telecommunications Bureau, Federal Communications Commission, from Richard K. Peterson, Manager, Air Traffic Division, Great Lakes Region, Federal Aviation Administration, transmitted via facsimile on February 26, 2002 (FAA Request).

<sup>2</sup> 47 C.F.R. § 87.107(a).

<sup>3</sup> 47 C.F.R. § 87.107(a)(3).

<sup>4</sup> *Id.*

<sup>5</sup> FAA Request at 1.

<sup>6</sup> *Id.*

that granting this request would improve airport safety by simplifying communications with air traffic control, allowing air traffic controllers to ascertain that a maintenance person is operating the aircraft instead of a pilot, and reducing runway incursions caused by maintenance technicians.<sup>8</sup>

We will treat the FAA Request for an exemption as a request for a waiver of Section 87.107(a)(3) of the Commission's Rules. Interested parties may file comments on the waiver request on or before March 21, 2002. Parties interested in submitting reply comments must do so on or before March 28, 2002. All comments should reference the subject Waiver Request including the DA number of this *Public Notice*, and should be filed with the Office of the Secretary, Federal Communications Commission, 445 Twelfth Street, SW, TW-325, Washington, D.C. 20554. A copy of each filing should be sent to 1) Qualex International, Portals II, 445 12th Street, S.W., Room CY-B402, Washington, DC, 20554, telephone 202-863-2893, e-mail [qualexint@aol.com](mailto:qualexint@aol.com); 2) Jeff Tobias, Federal Communications Commission, Wireless Telecommunications Bureau, Public Safety and Private Wireless Division, 445 Twelfth Street, S.W., Room 2-C828, Washington, D.C. 20554, telephone 202-418-1617, e-mail [jtobias@fcc.gov](mailto:jtobias@fcc.gov); 3) Kim Kleppinger, Federal Communications Commission, Wireless Telecommunications Bureau, Public Safety and Private Wireless Division, 1270 Fairfield Road, Gettysburg, PA 17325, telephone 717-338-2666, e-mail [kkleppin@fcc.gov](mailto:kkleppin@fcc.gov); and 4) Maria Ringold, Federal Communications Commission, Consumer Information Bureau, Reference Information Center, 445 Twelfth Street, S.W., Room CY-B529, Washington, D.C. 20554.<sup>9</sup>

The full text of the Waiver Request, comments and reply comments will be available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC, 20554. This document may also be purchased from the Commission's duplicating contractor, Qualex International, Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC, 20554, telephone 202-863-2893, facsimile 202-863-2898, or via e-mail [qualexint@aol.com](mailto:qualexint@aol.com). For further information regarding the public reference file for these waiver requests contact Maria Ringold, Chief, Wireless Branch, RIC, (202) 418-1355.

Unless otherwise provided, requests for waiver of the Commission's Rules are subject to treatment by the Commission as restricted proceedings for *ex parte* purposes under Section 1.1208 of the Commission's Rules, 47 C.F.R. § 1.1208. Because of the policy implications and potential impact of this proceeding on persons not parties to the waiver request, we believe it would be in the public interest to treat this case as a permit-but-disclose proceeding under the *ex parte* rules. See Sections 1.1200(a) and 1.1206 of the Commission's Rules, 47 C.F.R. §§ 1.1200(a) and 1.1206. Therefore, after the release of this *Public Notice*, *ex parte* presentations that are made on the issues involved in the subject Waiver Request will be allowed but must be disclosed in accordance with the requirements of Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b).

For further information, contact Mr. Jeff Tobias of the Public Safety and Private Wireless Division of the Wireless Telecommunications Bureau at (202) 418-1617, TTY (202) 418-7233 or via email to [jtobias@fcc.gov](mailto:jtobias@fcc.gov).

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<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> The address for FCC locations should be used only for documents filed by United States Postal Service. Documents delivered by Federal Express or any other express mail service should be addressed to the relevant person or office at the Federal Communications Commission, 445 Twelfth Street, S.W., Washington, D.C. 20024. Hand-delivered or messenger-delivered documents are accepted only at our new location at 236 Massachusetts Avenue, NE, Suite 110, Washington, D.C. 20002. See FCC Announces a New Filing Location for Paper Documents and a New Fax Number for General Correspondence, *Public Notice*, 16 FCC Rcd 22165 (2001).

By the Acting Chief, Public Safety and Private Wireless Division, Wireless Telecommunications  
Bureau.

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